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Attorney for Defendant Max Joseph Plog-Horowitz

United States District Court  
Northern District of California  
Oakland Division

# UNITED STATES OF AMERICA

*Plaintiff,*

VS.

MAX JOSEPH PLOG-HOROWITZ,

*Defendant.*

Case No. 4:12-cr-00661-CW-1

## STIPULATION PERMITTING TRAVEL

# STIPULATION PERMITTING TRAVEL

Mr. Plog-Horowitz' wife, Maria Stevenson, has recently been diagnosed with keratoconus, a progressive disease which makes it difficult for her to see, drive and operate without assistance. She had an ophthalmic evaluation and fitting on March 7, 2013 and is awaiting the delivery of special contact lenses which will allow her to safely manage these daily tasks without assistance.

Mr. Plog-Horowitz respectfully requests to be allowed to travel to Little Rock, Arkansas from Wednesday, March 13, 2013 to Sunday, March 24, 2013 to aid his wife until she receives her corrective lenses and is no longer functionally impaired.

The conditions of Mr. Plog-Horowitz' release do not currently allow him to travel outside of the Northern District of California.

Accordingly, the parties agree and stipulate that Mr. Plog-Horowitz' release conditions shall

1 be modified to permit him to travel outside of the Northern District of California to Little Rock,  
2 Arkansas from Wednesday, March 13, 2013 through Sunday, March 24, 2013 to aid his wife Maria  
3 Stevenson.

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5 **IT IS SO STIPULATED.**

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7 March 11, 2013

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Date

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10 March 11, 2013

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Date

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Date

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/s/ ACB

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ANNE C. BELES,  
Attorney for *Defendant*

/s/ JCM

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JAMES C. MANN,  
Assistant U.S. Attorney

/s/ VG

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VICTORIA GIBSON,  
U.S. Pretrial Services

United States District Court  
Northern District of California  
Oakland Division

# UNITED STATES OF AMERICA,

Case No. 4:12-cr-00661-CW-1

*Plaintiff,*

vs.

MAX JOSEPH PLOG-HOROWITZ,

## [PROPOSED] ORDER PERMITTING TRAVEL

*Defendant.*

## **ORDER PERMITTING TRAVEL**

The Court has read and considered the Stipulation to Modify Conditions of Release as to Defendant Plog-Horowitz, filed by counsel for the United States of America and defendant Max Joseph Plog-Horowitz in this matter on Monday, March 11, 2013. The Court hereby finds that the Stipulation, which this Court incorporates by reference into this Order, provides good cause to allow for a modification of defendant's Conditions of Release to permit travel outside of the Northern District of California to Little Rock, Arkansas to aid his wife Maria Stevenson.

**THEREFORE, FOR GOOD CAUSE SHOWN:**

The Court orders that defendant's release conditions shall be modified to permit him to travel to Little Rock, Arkansas, from Wednesday, March 13, 2013 through Sunday, March 24, 2013. All other conditions of release shall remain in effect.

## IT IS SO ORDERED.

3/12/13

Date

Kandis Westmore

Honorable Kandis A. Westmore  
United States Magistrate Judge  
Northern District of California